

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 3:18 CR 30183 NJR
)	
EDWARD OPOKU AKWABOAH,)	
)	
Defendant.)	

DEFENDANT'S MOTION FOR MEDICAL TREATMENT

COMES NOW, Defendant, by and through counsel, Bobby Bailey, and respectfully moves this Honorable Court to order medical treatment for physical injuries defendant suffered from a motor vehicle accident while a passenger in the Marion County Sheriff's transportation vehicle en route to Marion County Jail. Counsel believes that such treatment is needed and necessary. In support thereof Defendant states as follows:

1. On or about December 11, 2018, defendant was charged in an eight (8) count indictment with Conspiracy to Distribute Controlled Substances, in violation of 21 U.S.C. § 846; Six counts of Attempted Distribution of Methamphetamine and Heroin, in violation of 21 U.S.C. § 841(a)(1) and 846; and Money Laundering Conspiracy, in violation of 18 U.S.C. §1956 (h). Arraignment was held on January 25, 2019, and a jury trial is now set for May 28, 2019.
2. Counsel was appointed on or about March 15, 2019. Counsel interviewed defendant on March 22, 2019, and defendant stated that on January 22, 2019, while a passenger in Marion County Sheriff's transportation vehicle, and en route to Marion County Jail, the Marion County Sheriff's transportation vehicle was

involved in an motor vehicle accident. Defendant indicated to counsel that he suffered injuries to his back, neck, and right side of his body, and that he is currently in severe pain, and in need of medical treatment.

3. Defendant indicated to counsel that he has filed the Marion County Jail Grievance form with the Marion County Jail on January 25, 2019, January 29, 2019, February 18, 2019, and February 22, 2019, seeking medical treatment but to no avail.
4. Due to the serious nature of the motor vehicle accident pursuant to Illinois Traffic Crash Report (13-19-00089) and based upon counsel's conversation and observation of defendant, it therefore appears defendant is in need of medical treatment for the injuries he sustained in the motor vehicle accident on January 22, 2019.
5. Further, defendant has advised counsel that he believes it would be in his best interests to undergo medical treatment requested by counsel.
6. Based upon the foregoing facts, counsel believes that there is reasonable cause to believe that the defendant is suffering from physical injuries as a result of the motor vehicle accident and it is counsel's opinion that medical treatment is necessary.

WHEREFORE, defendant prays that the Court enter an Order for medical treatment regarding physical injuries defendant suffered from a motor vehicle accident while a passenger in the Marion County Sheriff's transportation vehicle en route to Marion County Jail on January 22, 2019.

Respectfully submitted,

SIMS & BAILEY, L.L.C.

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Signature of the foregoing document is also certification that the foregoing was filed electronically with the Clerk of the United States District Court for the Southern District of Illinois to be served by operation of the Court's electronic filing system upon Assistant United States Attorney, Donald Boyce, this 27th day of March, 2019.

/s/ bobby bailey
Bobby Bailey #56207MO